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U.S. BANKRUPTCY COURT  
MARY A. SCHOTT, CLERK

1 VERA CROWLEY  
2 2152 PONT NATIONAL DRIVE  
3 HENDERSON NV 89044  
4 702-481-0181  
5 Debtor  
6 IN PRO PER

UNITED STATES BANKRUPTCY COURT

7 KRISTIN A. SCHULER-HINTZ ESQ, NV SBN ) CHAPTER 7  
8 )  
9 MICHAEL CHEN ESQ, NV SBN 7307 ) CASE NO: 19-12008-abl  
10 )  
11 McCarthy & Holthus, LLP ) HEARING DATE: 5/22/2019  
12 )  
13 9510 WEST SAHARA AVE SUITE 200 ) HEARING TIME: 10:30am  
14 )  
15 LAS VEGAS NV 89117 ) *to the Motion of Relief*  
16 ) ~~OPPOSITION OF PROPOSED ORDER~~  
17 ) TERMINATING AUTOMATIC STAY AND  
18 ABANDONMENT  
19 PHONE (702) 685-0329  
20 FAX 866-339-5691  
21 NVGK@McCarthyHolthus.com

Debtor  
~~Plaintiff~~, VC

21 VERA CROWLEY,

Debtor

24 **OPPOSITION OF PROPOSED ORDER TERMINATING AUTOMATIC**  
25 **STAY AND ABANDONMENT**

26 VERA CROWLEY (the "Debtor"), the above-

28  
OPPOSITION OF PROPOSED ORDER TERMINATING AUTOMATIC STAY AND ABANDONMENT

1 Captioned debtor in possession hereby submits this objection to the Motion  
2 of the U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR  
3 CITIGROUP MORTGAGE LOAN TRUST INC. MORTGAGE PASS-  
4 THROUGH CERTIFICATES, SERIES 2007-AR7'S MOTION FOR  
5 RELIEF FROMN AUTOMATIC STAY AND ABANDONMENT I hereby  
6 object to motion to lift automatic stay and abandonment. Debtor is in  
7 modification. Debtor has notified law office on several occasions in regards  
8 to being in modification. Debtor also fax requested form to attorney office  
9 informing them of modification.

10 The law firm failed to return any calls.

11 This opposition is made and based upon the attached memorandum of  
12 points and authorities, the papers and pleadings as referenced herein, and any  
13 other materials the Court may consider in deciding this matter.

14 DATED this 8<sup>th</sup> day of May, 2019

15  
16 VERA CROWLEY  
17 In Pro Per

18  
19 MEMORANDUM OF POINTS AND AUTHORTIES

20 I. Introduction

21 This case involves Plaintiff, U.S. Bank National Association, as  
22 Trustee for Citigroup Mortgage Loan Trust Inc. Mortgage Pass-  
23 through Certificates, Series 2007-AR7, Its assignees and/or  
24 successors, by and through its servicing agent Nation Star  
25 Mortgage LLC d/b/a Mr. Cooper who is currently working on a  
26 modification for Vera Crowley for said property located at 2152  
27 Pont National Drive, Henderson NV 89044

28 II. Factual Background.

1  
2 A. The Parties.  
3

4 Vera Crowley at said property, located at 2152 Pont national drive  
5 Henderson NV 89044, is working with Mr, Cooper, a servicing  
6 co. for U.S. Bank/ Citigroup mortgage loan co. on a modification.  
7 Ms. Vera Crowley would like to keep her home as she has  
8 expressed to Mr. Cooper servicing LLC. Ms. Vera Crowley  
9 notified the law firm above as well on several occasions.

10 III. Argument.

11 A. RELIEF FROM AUTOMATIC STAY AND ABANDONMENT  
12 SHOULD NOT BE GRANTED

13 Debtor is currently working with servicing co. on modification.  
14 If automatic stay abandonment is lifted, Crowley would be in  
15 jeopardy of losing her home.

16 The law firm was notified of modification on several occasions.

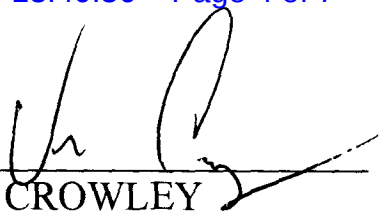
17 As noted above, automatic stay should not be lifted. This will  
18 cause a true hardship and could cause debtor to lose her home.  
19 Debtor is working with Nationstar mortgage/ Mr. Cooper on  
20 modification.

21 IV. Conclusion.

22 Based upon the above, the Debtor, Vera Crowley, herby request  
23 the automatic stay and abandonment not be lifted. Debtor is  
24 working on a modification with lenders. please see Attached  
25 EX.B.1 Modification Documents.

26 DATED this 8<sup>th</sup> day of May, 2019.

27 VERA CROWLEY  
28

  
VERA CROWLEY

In Pro Per  
2152 Pont National Drive  
Henderson NV 89044



8950 Cypress Waters Blvd.  
Coppell, TX 75019

04/23/2019



CALL INFO

ONLINE

www.mrcooper.com



2852 1 MB 0.428 T10 P1 AUTO 974846.1-NNNN-30200034  
VERA CROWLEY  
2152 PONT NATIONAL DR  
HENDERSON, NV 89044

YOUR INFO

DEBTOR(S)

VERA CROWLEY

CASE NUMBER

1912008

LOAN NUMBER

0611211186

PROPERTY ADDRESS

2152 PONT NATIONAL DR  
HENDERSON, NV 89044

Dear Vera Crowley:

We received your application for loss mitigation options and/or supporting documentation (the "Borrower Response Package"). We have determined that your application for loss mitigation is incomplete either because we are missing documentation or the information in the documentation you have supplied is incomplete. This letter includes a list of the document(s) we've already received and their status, the required document(s)/information we still need and the next steps for you to take. We encourage you to return the specified documentation to us by **5/23/2019**.

Vera Crowley			
Required Documents	Document Status	Expiration Date	Next Steps
Two months bank statements or other third party documents showing evidence of payments for benefits income	Not Received		Please provide the required document.
30 Days consecutive paystubs with employer name including year to date deductions and earnings	Update Needed		We need one more paystub to determine your income. Please provide an additional consecutive paystub.
4506T	Complete	8/14/2019	Nothing further is needed for this document at this time.
Homeowners association documentation (HOA Dues) showing amount and frequency of payment	Complete	12/1/2019	Nothing further is needed for this document at this time.
RMA (Request for Modification and Affidavit Form) Or UBAF (Uniform Borrower Assistance Form)	Complete	10/13/2019	Nothing further is needed for this document at this time.
Written explanation describing the details of the hardship and relevant documentation	Complete	5/31/2019	Nothing further is needed for this document at this time.

If any documents are shown to be '**not received**,' '**update needed**' or '**expired**,' we encourage you to return the document(s) to us as soon as possible. Various delivery options are provided on the next page. For the documents shown to be '**complete**,' please also reference the approaching expiration dates. Generally, the documentation you have provided expires 90 days from our receipt.

We have provided a reasonable date for you to return the completed Borrower Response Package to us. Please note that we may still review the application if it is received after that date, but the sooner the documents are returned to us the better.

Mr. Cooper is a brand name for Nationstar Mortgage LLC. Nationstar Mortgage LLC is doing business as Nationstar Mortgage LLC d/b/a Mr. Cooper. Mr. Cooper is a registered service mark of Nationstar Mortgage LLC. All rights reserved.

**Please be advised this communication is sent for informational purposes only and is not intended as an attempt to collect, assess, or recover a claim against, or demand payment from, any individual protected by the U.S. Bankruptcy Code. If this account has been discharged in a bankruptcy proceeding, be advised this communication is for informational purposes only and not an attempt to collect a debt against you; however, the servicer/lender reserves the right to exercise the legal rights only against the property securing the loan obligation, including the right to foreclose its lien under appropriate circumstances. Nothing in this communication shall be construed as an attempt to collect against the borrower personally or an attempt to revive personal liability.**

If you are a successor in interest (received the property from a relative through death, devise, or divorce, and you are not a borrower on the loan) that has not assumed, or otherwise become obligated on the debt, this communication is for informational purposes only and is not an attempt to collect a debt from you personally.





CRANCHING THE FACE OF HOME LOANS

**Notices of Error:**

If you believe an error has been made with respect to the mortgage loan, you should provide to us in writing the following information: Your name (and the name of the borrower, if you are an authorized third party), the loan account number, and the error you believe has occurred. To submit a notice of error, you must send this information to the following address:

Mr. Cooper  
Attn: Notice of Error/Request for Information  
PO Box 619098  
Dallas, TX 75261-9741

**Requests for Information:**

To request information regarding the account, you should provide to us in writing the following information: Your name (and the name of the borrower, if you are an authorized third party), the loan account number, and the information you are requesting with respect to your mortgage loan. To submit a request for information, you must send this information to the following address:

Mr. Cooper  
Attn: Notice of Error/Request for Information  
PO Box 619098  
Dallas, TX 75261-9741



974846.1-NNNN-121012352-2852.3\*



Once you have provided the additional documentation/information to us as requested, we will evaluate for all loss mitigation options available to you. At the conclusion of the evaluation period, which is generally 30 days, we will send you a notification informing you of the eligibility of those loss mitigation options. If you qualify for a loss mitigation option, you will have 14 days from the date of the offer letter to accept or reject the offer. If you do not respond within 14 days, the offer may be deemed as rejected. There is no guarantee that you will qualify or receive any loss mitigation options. Depending upon the programs for which you are evaluated, we may be required to obtain third party approval to determine your eligibility.

You may be entitled to additional protections under State or Federal law.

#### **What do I need to do?**

Return your complete Borrower Response Package with all requested documentation/information to us by 5/23/2019.

Submit your information to us as soon as possible so we can complete the review process.

- Online - [www.mrcooper.com](http://www.mrcooper.com)
- Email - [modification.assistance@mrcooper.com](mailto:modification.assistance@mrcooper.com)
- Fax - 214-488-1993
- Mail - Mr. Cooper  
Attn: Loan Modification Processing Unit  
PO Box 619097  
Dallas, TX 75261

Log in to our website [www.mrcooper.com](http://www.mrcooper.com) to track your loan modification status.

If you need assistance completing the package, you can visit [www.HUD.gov](http://www.HUD.gov) for access to HUD-approved counselors. You can also call the Homeowner's HOPE™ Hotline at 1-888-995-HOPE (4673). This Hotline can help with questions and offers access to free HUD-certified counseling services in English and Spanish.

You should also consider contacting Mortgagees of any other Mortgages secured by 2152 PONT NATIONAL DR, HENDERSON, NV 89044 to discuss available loss mitigation options.

If you have any questions, your Dedicated Loan Specialist is John Shuptrine and can be reached at (866)-316-2432 or via mail at PO Box 619097, Dallas, TX 75261. Our hours of operation are Monday through Thursday from 7 a.m. to 8 p.m. (CT), Friday from 7 a.m. to 7 p.m. (CT) and Saturday from 8 a.m. to 12 p.m. (CT). Visit us on the web at [www.mrcooper.com](http://www.mrcooper.com) for more information.

Sincerely

Mr. Cooper

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